

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 7
)	
Polo Builders, Inc., <i>et al.</i> ,)	Joint Case No. 04 B 23758
)	
Debtors.)	Hon. A. Benjamin Goldgar
)	

**AMENDMENT TO FINAL FEE APPLICATIONS OF
FREEBORN & PETERS AS SPECIAL COUNSEL TO THE CHAPTER 7 TRUSTEE**

Freeborn & Peters LLP (“F&P”), former special counsel to David R. Brown, the chapter 7 trustee (the “Trustee”) appointed in the above-captioned, jointly-administered bankruptcy cases, hereby amends the *Final Fee Application and Request to Limit Notice of Freeborn & Peters LLP as Special Counsel to the Chapter 7 Trustee* [Docket no. 1030] and the *Final Fee Application and Request to Limit Notice of Freeborn & Peters LLP as Special Counsel to the Chapter 7 Trustee; and Request to Have Application Deemed Timely Filed* [Docket No. 1289] (collectively, the “*Final Fee Applications*”), by deleting paragraph 76 of the Applications in their entirety and replacing them with the following:

“76. F&P recognizes that while it is expected that substantial sums may be brought into the Debtors’ estates in the future, both as a result of the Merchant Settlement and recoveries on the Ponzi Scheme avoidance actions brought by the Trustee, the administrative claims sought by the Trustee and his professionals are substantial, and run the risk of fully subsuming available estate resources.”

Dated: October 2, 2012

FREEBORN & PETERS LLP

By: /s/ Neal H. Levin

Neal H. Levin (No. 6203156)
FREEBORN & PETERS LLP
311 South Wacker Drive, Suite 3000
Chicago, Illinois 60606
Telephone: 312.360.6000
Facsimile: 312.360.6520